

Stephen Fisher

Albuquerque, NM 87121

July 11, 2016

Received & Inspected

JUL 18 2016

FCC Mail Room

Federal Communications Commission  
Wireline Competition Bureau  
Competition Policy Division  
Washington, DC 20554

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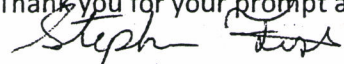
Re: § 63.71 Application of AT&T Corp., AT&T Communications of Indiana, LLC, AT&T Communications of New York, Inc., AT&T Communications of Texas, LLC, AT&T Communications of Virginia, LLC and Alascom, Inc. d/b/a AT&T Alaska

My AT&T Residential Long Distance statement states that AT&T will discontinue residential postpaid calling card services on October 1, 2016 pending federal and state regulatory approval. This action should not be permitted because there are no suitable alternatives in the market for this service. The closest alternative, prepaid calling cards, are inadequate for reasons including, but not limited to, the following:

- They do not provide call detail (number called, minutes used and price charged) so the customer does not have an accurate accounting of the money they spent nor does it allow them to monitor for fraudulent use of the card.
- Minutes usually expire after a certain amount of time
- Different rates for certain types of calls leads to the inability to determine how much service is left on the card. For example, in-state calling in certain states with an AT&T calling card consumes 2 or 3 minutes per actual minute of call time. Surcharges for services such as directory assistance or for calling from a payphone are converted to blocks of minutes that are deducted from the card all at once.
- When a card runs out, an ongoing call will be interrupted and new calls cannot be made. Refilling the card by phone requires a credit card, which many either do not have or do not want to use for paying for long distance calls. Purchasing a new card is tedious and may not even be possible while on travel, which is the most common time one would use a calling card.

AT&T is continuing to offer prepaid calling cards as well as postpaid calling cards for business, so it should not be burdensome on them to continue offering postpaid calling card services for residential customers.

Thank you for your prompt attention to this matter,

  
Stephen Fisher

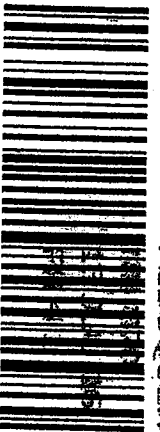
cc: New Mexico Public Regulation Commission  
Consumer Relations Division  
1120 Paseo De Peralta  
PO Box 1269  
Santa Fe, NM 87504

Stephen Fisher

Albuquerque, NM 87121



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